

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

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UNITED STATES OF AMERICA

v.

MATTHEW T. DELEO, and

STEPHEN GRISWOLD

Defendants.

Cr. No. _____

In violation of 18 U.S.C. §§ 371 and 641

INDICTMENT

The Grand Jury charges that:

FILED
MAR 24 2016
U.S. DISTRICT COURT
DISTRICT OF RHODE ISLAND

COUNT I

From a time unknown, up to and including December 13, 2015, in the District of Rhode Island and elsewhere, the defendants, MATTHEW THOMAS DELEO and STEPHEN GRISWOLD, knowingly combined, confederated and agreed together and with other persons, known and unknown to the Grand Jury, to commit an offense against the United States of America, namely to embezzle, steal, purloin, and knowingly convert to their use and the use of another, without authority, things of value to the United States and departments and agencies thereof, in a value in excess of \$1000, in violation of Title 18, United States Code, Section 641.

PURPOSE, MANNER AND MEANS OF THE CONSPIRACY

The purpose of the conspiracy was to profit from the sale of government property stolen from Naval Weapons Station Yorktown-Cheatham Annex, a military installation located in the Eastern District of Virginia.

1. It was a part of the conspiracy that DELEO, GRISWOLD and co-conspirators

met in Providence, Rhode Island on December 11, 2015.

2. It was a further part of the conspiracy that defendants DELEO, GRISWOLD and co-conspirators travelled from Providence, Rhode Island to Naval Weapons Station Yorktown-Cheatham Annex, leaving on December 11, 2015.
3. It was a further part of the conspiracy that defendants DELEO, GRISWOLD and co-conspirators resided in a rented cabin on Naval Weapons Station Yorktown-Cheatham Annex, during the weekend of December 11, 2015 through December 13, 2015.
4. It was a further part of the conspiracy that some or all of the co-conspirators entered a warehouse on board Naval Weapons Station Yorktown-Cheatham Annex on the night of December 12, 2015 through December 13, 2015 and proceeded to remove and load government property into a vehicle.
5. It was a further part of the conspiracy that prior to and on December 13, 2015, DELEO, GRISWOLD and co-conspirators stored property stolen from Naval Weapons Station Yorktown-Cheatham Annex at various locations in the District of Rhode Island, and elsewhere.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, the defendant and one or more co-conspirators performed the following overt acts in the District of Rhode Island and elsewhere:

1. On or about December 11, 2015, defendants DELEO, GRISWOLD and two other co-conspirators went to DELEO's house, located in Providence, Rhode Island, where they retrieved clothing and tools.
2. On or about December 11, 2015, defendants DELEO, GRISWOLD and two other co-conspirators drove together from Rhode Island to Naval Weapons

Station Yorktown-Cheatham Annex, a military installation located in the Eastern District of Virginia.

3. On or about December 11, 2015, defendants DELEO, GRISWOLD and two other co-conspirators arrived on Naval Weapons Station Yorktown-Cheatham Annex, drove to a rented cabin on the military installation, entered a mini-van which they brought to the installation, drove in the mini-van around the installation, and discussed their plans for the weekend.
4. On or about December 12, 2015, defendants DELEO, GRISWOLD and two other co-conspirators drove the same mini-van off base to a Home Depot, where they bought a ladder, gloves, rope, tape, trash bags, and other items.
5. On or about December 13, 2015, defendants DELEO, GRISWOLD and two other co-conspirators entered a warehouse on board Naval Weapons Station Yorktown-Cheatham Annex and remained inside for approximately two to three hours.
6. Prior to and on or about December 13, 2015 defendants DELEO, GRISWOLD and coconspirators stored stolen United States government property, including: United States Navy (USN) working uniforms, USN winter gear, USN flame retardant shirts and pants, USN soft body armor, USN goggles, USN name tags, USN Navy SEAL Trident insignia, and Small Arms Protective Insert plates in both a North Providence, Rhode Island storage unit and DELEO's residence located in Providence, Rhode Island.

All in violation of Title 18, United States Code, Section 371.

COUNT II

From a time unknown, up to and including December 13, 2015, in the District of

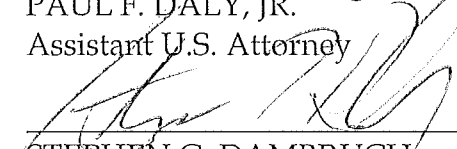
Rhode Island and elsewhere, the defendants, MATTHEW THOMAS DELEO and STEPHEN GRISWOLD, willfully and knowingly did receive, conceal and retain stolen property of the United States, that is, United States Navy clothing and apparel, United States Navy soft body armor and ballistic protection, United States Navy tools and equipment and United States Navy Small Arms Protective Insert plates, of a value in excess of \$1,000.00, with intent to convert said property to their own use, then knowing said property to have been stolen, in violation of 18 U.S.C. § 641.

A TRUE BILL:

REDACTED

PETER F. NERONHA
UNITED STATES ATTORNEY


PAUL F. DALY, JR.
Assistant U.S. Attorney


STEPHEN G. DAMBRUCH
First Assistant U.S. Attorney

DATE: 3/24/2016